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 Attorneys for Plaintiff
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6 UNITED STATES DISTRICT COURT

7 FOR DISTRICT OF NORTHERN CALIFORNIA

8 VLADIMIR A. BALAREZO, individually and
 on behalf of others similarly situated

9 Plaintiff,
 10 vs.

11 NTH CONNECT TELECOM INC., AND
 STEVEN CHEN,

12 Defendants

13 Case No.:C07-05243 JF

14 CLASS ACTION COMPLAINT AND
 DEMAND FOR JURY TRIAL:

15 1). Violation of California Labor Code §1194;
 2). Violations of The Fair Labor Standards Act
 (Non-payment of overtime); 3). Violation of
 Labor Code §226.7; 4). "Waiting Time"
 Penalties under California Labor Code §203;
 and 6). For Restitution of Unpaid Wages in
 Violation of California Unfair Trade Practices
 Act under Business and Professions Code §
 17203

16 Plaintiff demands a trial by jury for causes of action alleged in his Complaint.

17 Dated: October 12, 2007

DAL BON & WANG
 ADAM WANG

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 19 By: /s/ ADAM WANG.

20 Attorney for Plaintiff
 21 Vladimir Balarezo